



UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MAYRA ISABEL LOPEZ,

Defendant.

2:23-CR-137-CDS-DJA

Preliminary Order of Forfeiture

This Court finds Mayra Isabel Lopez pled guilty to Count One of a One-Count Criminal Information charging her with trafficking in counterfeit goods in violation of 18 U.S.C. § 2320(a)(1). Criminal Information, ECF No. 4; Arraignment & Plea, ECF No. 9; Plea Agreement, ECF No. 6.

This Court finds Mayra Isabel Lopez agreed to the forfeiture of the property set forth in the Plea Agreement and the Forfeiture Allegation of the Criminal Information. Criminal Information, ECF No. 4; Arraignment & Plea, ECF No. 9; Plea Agreement, ECF No. 6.

This Court finds, under Fed. R. Crim. P. 32.2(b)(1) and (b)(2), the United States of America has shown the requisite nexus between property set forth in the Plea Agreement and the Forfeiture Allegation of the Criminal Information and the offense to which Mayra Isabel Lopez pled guilty.

The following property is (1) any article, the making or trafficking of which is prohibited under 18 U.S.C. § 2320(a)(1) and (2) any property used, or intended to be used, in any manner or part to commit or facilitate the commission of 18 U.S.C. § 2320(a)(1) and is subject to forfeiture under 18 U.S.C. § 2323(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 2323(a)(1)(B) with 28 U.S.C. § 2461(c); and 18 U.S.C. § 2323(b)(1):

1 1. any and all counterfeit designer goods including, but not limited to, the following:

- 2 i. 4 counterfeit Balenciaga hats;
- 3 ii. 2 counterfeit Balenciaga sweaters;
- 4 iii. 4 counterfeit Burberry hats;
- 5 iv. 10 counterfeit Burberry handbags;
- 6 v. 12 counterfeit Burberry pants;
- 7 vi. 21 counterfeit Burberry shirts;
- 8 vii. 1 counterfeit Calvin Klein belt;
- 9 viii. 4 counterfeit Chanel belts;
- 10 ix. 71 counterfeit Chanel handbags;
- 11 x. 6 counterfeit Chanel hats;
- 12 xi. 4 counterfeit Chanel pants;
- 13 xii. 42 counterfeit Chanel shirts;
- 14 xiii. 8 pairs of counterfeit Chanel shoes;
- 15 xiv. 13 counterfeit Chanel sunglasses;
- 16 xv. 9 counterfeit Chanel swimsuits;
- 17 xvi. 82 counterfeit Christian Dior handbags;
- 18 xvii. 2 counterfeit Christian Dior hats;
- 19 xviii. 15 counterfeit Christian Dior pants;
- 20 xix. 39 counterfeit Christian Dior shirts;
- 21 xx. 55 pairs of counterfeit Christian Dior shoes;
- 22 xxi. 1 counterfeit Christian Dior sunglasses;
- 23 xxii. 11 counterfeit Christian Dior sweatshirts;
- 24 xxiii. 19 counterfeit Christian Dior swimsuits;
- 25 xxiv. 2 counterfeit Coach wallets;
- 26 xxv. 3 counterfeit Couture scarves;
- 27 xxvi. 6 counterfeit Dolce pants;
- 28 xxvii. 6 counterfeit Dolce shirts;

- xxviii. 42 counterfeit Fendi handbags;
- xxix. 15 counterfeit Fendi hats;
- xxx. 20 counterfeit Fendi pants;
- xxxi. 18 counterfeit Fendi shirts;
- xxxii. 3 counterfeit Fendi sunglasses;
- xxxiii. 1 counterfeit Fendi sweatshirts;
- xxxiv. 24 counterfeit Fendi swimsuits;
- xxxv. 1 counterfeit Fendi wallet;
- xxxvi. 9 counterfeit Ferragamo belts;
- xxxvii. 3 counterfeit Givenchy pants;
- xxxviii. 2 counterfeit Givenchy shirts;
- xxxix. 104 counterfeit Gucci belts;
- xl. 9 counterfeit Gucci bracelets;
- xli. 207 counterfeit Gucci handbags;
- xl.ii. 50 counterfeit Gucci hats;
- xl.iii. 26 counterfeit Gucci pants;
- xl.iv. 2 counterfeit Gucci scarves;
- xl.v. 50 counterfeit Gucci shirts
- xl.vi. 231 pairs of counterfeit Gucci shoes;
- xl.vii. 47 counterfeit Gucci sunglasses;
- xl.viii. 12 counterfeit Gucci sweatshirts;
- xl.ix. 96 counterfeit Gucci wallets;
- l. 17 counterfeit Gucci watches;
- li. 5 counterfeit Hermes handbags;
- lii. 61 counterfeit Louis Vuitton belts;
- lii.iii. 610 counterfeit Louis Vuitton handbags;
- liv. 16 counterfeit Louis Vuitton hats;
- lv. 26 counterfeit Louis Vuitton pants;

- lvi. 37 counterfeit Louis Vuitton shirts;
- lvii. 88 counterfeit Louis Vuitton shoes;
- lviii. 10 counterfeit Louis Vuitton sunglasses;
- lix. 6 counterfeit Louis Vuitton sweatshirts;
- lx. 47 counterfeit Louis Vuitton swimsuits;
- lxi. 153 counterfeit Louis Vuitton wallets;
- lxii. 5 counterfeit Louis Vuitton watches;
- lxiii. 4 counterfeit MCM handbags;
- lxiv. 6 counterfeit MCM hats;
- lxv. 1 counterfeit MCM wallet;
- lxvi. 3 counterfeit Michael Kors belts;
- lxvii. 14 counterfeit Michael Kors shirts;
- lxviii. 2 counterfeit Michael Kors scarves;
- lix. 11 counterfeit Moschino pants;
- lxx. 14 counterfeit Moschino shirts;
- lxxi. 17 counterfeit North Face/Gucci shirts;
- lxxii. 29 counterfeit Prada handbags;
- lxxiii. 20 counterfeit Prada shirts;
- lxxiv. 2 counterfeit Prada sunglasses;
- lxxv. 5 counterfeit Prada wallets;
- lxxvi. 9 counterfeit Rolex watches;
- lxxvii. 2 counterfeit Supreme hats;
- lxxviii. 1 counterfeit Tory Burch handbag;
- lxxix. 2 pairs of counterfeit Tory Burch shoes;
- lxxx. 10 counterfeit Versace belts;
- lxxxi. 3 counterfeit Versace handbags;
- lxxxii. 11 counterfeit Versace pants;
- lxxxiii. 21 counterfeit Versace shirts;

lxxxiv. 29 counterfeit Versace sunglasses;

lxxxv. 6 counterfeit Versace sweatshirts;

lxxxvi. 5 counterfeit Versace watches

lxxxvii. 28 counterfeit YSL handbags;

lxxxviii. 3 counterfeit YSL wallets;

lxxxix. 8 counterfeit YSL shirts;

xc. 5 counterfeit YSL pants;

xi. 1 counterfeit YSL clutch; and

xcii. 1 counterfeit YSL hat

(all of which constitutes property).

This Court finds that on the government's motion, the Court may at any time enter an order of forfeiture or amend an existing order of forfeiture to include subsequently located property or substitute property under Fed. R. Crim. P. 32.2(e) and 32.2(b)(2)(C).

This Court finds the United States of America is now entitled to, and should, reduce the aforementioned property to the possession of the United States of America.

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the United States of America should seize the aforementioned property.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory rights, ownership rights, and all rights, titles, and interests of Mayra Isabel Lopez in the aforementioned property are forfeited and are vested in the United States of America and shall be safely held by the United States of America until further order of the Court.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States of America shall publish for at least thirty (30) consecutive days on the official internet government forfeiture website, www.forfeiture.gov, notice of this Order, which shall describe the forfeited property, state the times under the applicable statute when a petition contesting the forfeiture must be filed, and state the name and contact information for the government attorney to be served with the petition, under Fed. R. Crim. P. 32.2(b)(6). Notice is served on any individual or entity on the date when it is placed in the mail,

1 delivered to a commercial carrier, or sent by electronic mail under Fed. R. Crim. P.
2 32.2(b)(6)(D) and Supplemental Rule G4(b)(i) and (iv).

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual
4 or entity who claims an interest in the forfeited property must file a petition for a hearing to
5 adjudicate the validity of the petitioner's alleged interest in the property under 21 U.S.C. §
6 853(n)(2), which petition shall be signed by the petitioner under penalty of perjury under 21
7 U.S.C. § 853(n)(3) and 28 U.S.C. § 1746, and shall set forth the nature and extent of the
8 petitioner's right, title, or interest in the property, the time and circumstances of the
9 petitioner's acquisition of the right, title or interest in the property, any additional facts
10 supporting the petitioner's claim, and the relief sought.

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,
12 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas,
13 Nevada 89101, no later than thirty (30) days after the notice is sent or, if direct notice was
14 not sent, no later than sixty (60) days after the first day of the publication on the official
15 internet government forfeiture site, www.forfeiture.gov, whichever is earlier.

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the
17 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United States
18 Attorney's Office at the following address at the time of filing:

19 Daniel D. Hollingsworth
20 Assistant United States Attorney
21 Misty L. Dante
22 Assistant United States Attorney
23 501 Las Vegas Boulevard South, Suite 1100
24 Las Vegas, Nevada 89101.

25 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice
26 described herein need not be published in the event a Declaration of Forfeiture is issued by
27 the appropriate agency following publication of notice of seizure and intent to
28 administratively forfeit the above-described property.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send
2 copies of this Order to all counsel of record.

3 DATED August 17, 2023.

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7 UNITED STATES DISTRICT JUDGE
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